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16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 JACK DIEP; JORY LEVY; JAMES DAYAP;  
MARVIN CUTCHINS; and RAY CHARLIES,  
19 JR., individually and on behalf of all others  
similarly situated,

20 Plaintiffs,

21 v.

22 LIBERTY MEDIA CORPORATION d/b/a  
FORMULA ONE HEINEKEN SILVER LAS  
23 VEGAS GRAND PRIX, a foreign corporation;  
LAS VEGAS GRAND PRIX, INC., a Nevada  
24 corporation,

25 Defendants.

Case No. 2:23-cv-02124-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND THE TIME FOR  
DEFENDANTS LIBERTY MEDIA  
CORPORATION AND LAS VEGAS  
GRAND PRIX, INC. TO FILE REPLY  
IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PLAINTIFFS'  
FIRST AMENDED COMPLAINT**

**(First Request)**

1 Pursuant to Local Rule IA 6-1, 6-2, and LR 7-1, the undersigned counsel of record for  
2 Plaintiffs Jack Diep, Jory Levy, James Dayap, Marvin Cutchins, and Ray Charles, Jr. (collectively,  
3 “Plaintiffs”), Defendant Liberty Media Corporation (“Liberty”), and Defendant Las Vegas Grand  
4 Prix, Inc. (“LVGP”) (collectively, “Defendants”) hereby STIPULATE to extend the time for  
5 Defendants to file their reply brief in support of Defendants’ Motion to Dismiss Plaintiffs’ First  
6 Amended Complaint (“Reply”). Defendants filed their Motion to Dismiss Plaintiffs’ First  
7 Amended Complaint (“MTD”) on April 15, 2025.

8 On March 12, 2025, Plaintiffs filed their First Amended Consolidated Class Action  
9 Complaint (“FACCAC”). ECF No. 55. On March 18, 2025, the parties filed a joint stipulation to  
10 extend Defendants’ time to respond to the FACCAC. ECF No. 58. On March 19, 2025, the Court  
11 granted the parties’ joint stipulation and extended Defendants’ deadline to respond to the FACCAC  
12 to April 15, 2025. ECF No. 59. On April 15, 2025, Defendants filed their MTD. ECF No. 62.  
13 Plaintiffs filed their Opposition to Defendants’ MTD on April 29, 2025. ECF No. 68.

14 Pursuant to Local Rule LR 7-2, the current deadline for Defendants to file their Reply is  
15 May 6, 2025. Counsel for Defendants and Plaintiffs have met and conferred and determined that  
16 a modest briefing extension of three days to accommodate Defendants’ counsels’ competing  
17 professional obligations for a mediation and trial preparation would be reasonable.

18 If approved, Defendants shall have until May 9, 2025 to file their Reply. This is  
19 Defendants’ first request for an extension of their deadline to file their Reply.<sup>1</sup> This stipulation is  
20 sought in good faith, is not interposed for delay, and is not filed for an improper purpose.

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26 <sup>1</sup> As noted, the Court previously granted the Parties’ stipulation extending Defendants’ deadline  
27 to file their response to the FACCAC (ECF Nos. 58, 59), but that stipulation did not alter  
28 Defendants’ deadline under LR 7-2(b) to file their Reply.

1 Dated this 30th day of April, 2025.

2 Respectfully submitted,

3 **HAGENS BERMAN SOBOL SHAPIRO**  
4 **LLP**

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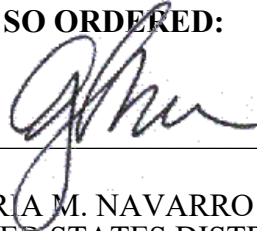
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12 **IT IS SO ORDERED:**

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15 GLORIA M. NAVARRO  
16 UNITED STATES DISTRICT JUDGE

17 DATED: May 1, 2025.  
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